

Corl, Christina

From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Wednesday, April 22, 2020 8:03 AM
To: Fox, Bruce
Cc: Horowitz, Andrew; Chen, Qiwei
Subject: RE: Case 2:19-cv-01976-JLG-CMV Huang v. Ohio State University et al - Plaintiff's Notices for the Depositions and FRCP 34 Property Inspection Request

Counsel, several things:

Deposition notices: 1. The June 16 date for Kristi Hoge does not work. Let me know if June 17 or 18 can work as alternate dates. 2. The July 10 date for Dr. Rizzoni should work, but I am confirming with him for sure on Friday and will let you know. 3. We have a message to Jonathan Parry and are waiting to hear back from him. 4. With respect to Phoebe You, as previously advised, she resides full time in China and has no plans to travel to the US any time soon. Please advise how you propose promulgating her deposition, e.g. mechanics, technology, etc. and we will follow up with her. 5. All depositions in Columbus of defense witnesses will take place either at my office or at General Counsel's office on campus at OSU.

Notices of home/university office inspections: I still have no idea how such inspections are relevant to your claims. Mr. Fox's prior reference to viewing the "scene of the crime" does not shed any further light. Again, I am requesting that you provide an explanation as to how the inspections will result in any material fact in this case being any more or less likely. At this point, Defendants are not inclined to agree to any office inspections. I will, however, await further explanation/justification from Plaintiff on this topic.

Meet and Confer: I can be available to speak on the phone tomorrow (4/23) at 9, 10 or 11 am. If those times do not work, please provide some suggested dates/times for next week.

Plaintiff's deposition: I heard yesterday that Plaintiff currently resides in California. I will want to take her deposition in person some time over the summer. If you could find out if/when she might be back in Ohio or even at your office, let me know those dates. If not, we can always travel to California for her deposition. In any event, I just wanted to request that you start thinking about logistics and a date for her deposition.

ESI: Per the Parties' Rule 26 report and the court order issued yesterday, we have already agreed to a protocol for ESI discovery. I'm not sure what else you believe we need to discuss on this topic.



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From: Fox, Bruce [mailto:bruce.fox@obermayer.com]
Sent: Tuesday, April 21, 2020 5:52 PM
To: Corl, Christina



Corl, Christina

From: Fox, Bruce <bruce.fox@obermayer.com>
Sent: Wednesday, May 27, 2020 10:24 AM
To: Corl, Christina
Cc: Horowitz, Andrew; Chen, Qiwei
Subject: RE: Huang v. OSU

[EXTERNAL]

I suggest we discuss these issues after the call with the court and make an attempt to meet and confer, as I first need to discuss your proposal with my litigation team and IT support. It seems to me that we can work with you if you can produce the documents on a rolling basis according to some reasonable timetable and have a hard deadline for production of all responsive documents that is not too far out into the future.

From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Wednesday, May 27, 2020 7:33 AM
To: Fox, Bruce <bruce.fox@obermayer.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Chen, Qiwei <qawei.chen@obermayer.com>
Subject: Huang v. OSU

Counsel, in advance of our court conference today, I wanted to give you an update on Defendants' document production with reference to Plaintiff's first RFPDs to OSU and Dr. Rizzoni.

Our initial ESI search resulted in 200,000 responsive documents. We have de-duped the documents and refined the searches a bit, but are still reviewing in excess of 100,000 documents. I have 12 attorneys at my firm conducting the document review for production. Even with that number of reviewers, it seems unlikely that we will have a full production ready to go by the agreed deadline(s).

Reserving applicable objections to relevancy, privilege, etc., I am proposing that the Defendants respond to Plaintiff's first interrogatories and produce as many documents as possible in response to the first RFPD on the currently-agreed dates of June 5 (OSU) and June 8 (Rizzoni). The initial production will contain most (if not all) non-email documents such as policies, training, HR investigation file, etc. Defendants will then serially produce additional relevant and responsive documents as they are reviewed and ready for production.

Please advise if that plan is acceptable or if you have any clarifying questions. If not acceptable, I intend to bring up the issue with the Court today.



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Corl, Christina

From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Thursday, June 18, 2020 11:26 AM
To: Horowitz, Andrew
Cc: Fox, Bruce; Chen, Qiwei; Genard, Allison
Subject: RE: Huang v. OSU - Deficiency Letter

Counsel, I will review and get back to you in writing. Because Plaintiff, during our last dispute on a discovery issue, totally misconstrued and attempted to use my oral statements against the Defendants with the Court, all communications on discovery disputes will be conducted henceforth in writing only.

On another matter, I don't think we've heard from our mediator for some time. I don't think the mediator ever responded to your questions about mediation statements. Have you been in contact with the mediator?

Thanks



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From: Horowitz, Andrew <Andrew.Horowitz@obermayer.com>
Sent: Thursday, June 18, 2020 10:23 AM
To: Corl, Christina <CCorl@plunkettcooney.com>
Cc: Fox, Bruce <bruce.fox@obermayer.com>; Chen, Qiwei <qawei.chen@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
Subject: Huang v. OSU - Deficiency Letter

[EXTERNAL]

Counsel:

Please see the attached letter addressing various deficiencies in Defendants' responses to discovery. Please let me know if you are available Tuesday, June 23rd at 4PM to discuss. Thank you.

Andrew Horowitz